



November 10, 2023

Via ECF

The Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007  
(212) 805-0282

Re: **ALBERTO RAMOS v. PALM WEST CORPORATION et al.**  
*Case No. 23-09441*

Dear Honorable Judge Furman,

I represent Plaintiff, Alberto Ramos in the above-referenced matter. With the consent of Defendants' counsel and for the reasons set forth below, I respectfully request for an extension of Defendants' Motion to Dismiss briefing deadlines and the time for Plaintiff to file his Complaint. The current deadlines are below. This is Plaintiff's first request. This request does not affect any other deadlines as the Initial Pretrial Conference in this matter is scheduled for February 13, 2024. (Dkt. No. 9).

By way of background, Defendants removed this matter prior to Plaintiff filing his Complaint in the Supreme Court of New York and pending a motion for additional time to serve the individual defendants in the Supreme Court of New York, Bronx County (Index No. 808303/2023E). Currently, the deadline for Plaintiff to file his Complaint is November 16, 2023. The parties have conferred on the outstanding issues and intend to engage in further discussions in response to Defendants Motion to Dismiss. Therefore, I respectfully make this request because I am preparing for trial on another matter that is scheduled to start on November 15, 2023 at the New York State Division of Human Rights and to allow the parties time to address issues raised by Defendants motion and currently pending in the New York State Supreme Court.

Accordingly, I respectfully request the following briefing schedule:

	Current Deadline	Proposed Deadline
Plaintiff's Complaint and opposition due	November 16, 2023 and November 17, 2023	December 8, 2023
Defendants' reply due	November 24, 2023	December 22, 2023

I thank Your Honor for your consideration in this matter.

Respectfully submitted,



Melissa Mendoza, Esq.

One Penn Plaza, Suite 4905  
New York, New York 10119  
(212) 587-0760

cc: Via ECF

Devin S. Cohen (Counsel for Defendants)

Application GRANTED. The Clerk of Court is directed to terminate  
ECF No. 16.

SO ORDERED.



November 13, 2023